



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

Emergency and Remedial Response Division
Program Support Branch
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Andy's revised letter
Work in with My comments
ala discussion w/ Kim -
Re: RD

MEMORANDUM

TO: Steve Cipot - Project Manager
ERRD/NJRB

FROM: Andy Crossland - Geologist
ERRD/PSB/TST

DATE: Friday, November 19, 1999

SUBJECT: Review of the *Hotspot B and Hotspot C Subsurface Investigation*, L.E. Carpenter site, Wharton, New Jersey.

In response to your request, I have reviewed the document listed above. If you have any questions concerning these comments, please feel free to call me at x4436.

1. The work plan for this study indicated that soils would be tested for TCLP. The report states that TCLP analyses were deemed "not appropriate at this time." Testing is deferred until after remedial options are considered. Excavation and removal has already been selected as the remedial option for the hot spots. A convincing argument for changing the remedy has not been made and the remedy should proceed. In order to proceed, TCLP analyses are needed and should be conducted without delay.
2. Although soils volumes are given in the report, the true extent of contamination remains undelineated. In several cases, samples with high levels of contamination are at the periphery of the sampling area, both horizontally and vertically. Whatsmore, there is no figure or calculations presented to illustrate what areas are included in the volumes proposed. Given the pack of delineation, two possible ways to proceed present themselves. The first is complete the delineation. This would require additional sampling until the limits of contamination are well defined, both horizontally and vertically. Alternatively, the effort could move to design, arbitrarily adding 50% to existing volume estimates, based on the fact that additional soils will clearly need to be removed. In either case, the actual extent of the soils removed will be based on post excavation sampling.
3. Although the text states that samples were collected at depths of 2.5 and 5 feet bgs, this is clearly not the

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case. This should be accurately reflected in the text and the reasons for work plan modification should be discussed.